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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

VIACOM INTERNATIONAL INC., ET AL.

Plaintiffs,

v.

YOUTUBE, INC., ET AL.

Defendants.

CASE NO.: 3:08-MC-80129-SI

[Case No. 07-cv-02103 (LLS) in the U.S. D.C., S.D.N.Y]

[PROPOSED] ORDER AND STIPULATION FOR AN EXTENSION OF TIME TO PRODUCE DOCUMENTS

THE FOOTBALL ASSOCATION PREMIER LEAGUE LIMITED, ET AL.,

Plaintiffs,

v.

YOUTUBE, INC., ET AL.

Defendants.

Dockets.Justia.com

WHEREAS on August 18, 2008, in response to the Motion to Compel Production of Documents Pursuant to Subpoenas filed by Viacom International Inc. et al., and The Football Association Premier League Limited, et al. ("Plaintiffs"), this Court ordered Artis Capital Management L.P., Sequoia Capital Operations LLC, and TriplePoint Capital LLC ("Respondents") to produce certain documents ("Ordered Documents") by October 2, 2008 "unless [P]laintiffs and [R]espondents agree to a different deadline";

WHEREAS the volume of data Respondents have been obligated to restore from back-up tapes and review in connection with the production of Ordered Documents makes meeting the Court-ordered deadline of October 2, 2008 impracticable;

WHEREAS Respondents need to and through October 27, 2008 to finalize their review and preparation of the Ordered Documents for production;

WHEREAS Respondents have agreed to produce documents responsive to all of the requests as to which Plaintiffs and Respondents had previously reached agreement, up to November 13, 2006 ("Agreed Upon Documents") by not later than September 26, 2008;

WHEREAS Respondents will use best efforts to produce a complete privilege log contemporaneously with production of the Ordered Documents, or as shortly thereafter as possible;

THEREFORE: The parties stipulate that (1) the deadline for Respondents' production of Agreed Upon Documents shall be September 26, 2008; and (2) the deadline for Respondents' production of the Ordered Document shall be moved from October 2, 2008 to October 27, 2008.

IT IS SO STIPULATED.

Date: Sept. 19, 2008

Michael H. Rubin /s/
Michael H. Rubin
Attorneys for Non-Parties

Date: SEPT. 19, 2008

Stephen Hibbard /s/
Stephen Hibbard
Attorneys for Viacom Plaintiffs

Date: SEPT. 19, 2008

David Hassel /s/
David Hassel
Attorneys for Premier League Plaintiffs

[PROPOSED] ORDER

Good cause appearing, IT IS HEREBY ORDERED that (1) the deadline for Respondents' production of Agreed Upon Documents shall be September 26, 2008; and (2) the deadline for Respondents' production of Ordered Documents shall be moved from October 2, 2008 to October 27, 2008.

SO ORDERED.

____
Judge Susan Illston